



June 11, 2019

*Via Electronic Mail*

The Honorable Members of the  
California Public Employment Relations Board  
c/o Kristina Gonzalez, Assistant to the Board  
1031 18th Street  
Sacramento, California 95811

RE: Comments On Proposed Regulation Packages (June 13, 2019, Board Meeting)

Dear Board Members:

The California Public Employers Labor Relations Association (CALPELRA) appreciates the opportunity to comment on PERB's new proposed regulation packages, and commends the Board and staff on the skill and care that went into drafting the proposed regulatory changes. The well drafted proposed regulations provided needed clarification on a number of important matters.

CALPELRA is a professional, California nonprofit association established in 1975, comprised of public sector professional management representatives responsible for carrying out the labor relations/human resource programs for their jurisdictions. CALPELRA's members work in city, county, or state government, school districts, community colleges, state university systems, trial courts, the judicial council, and special districts. Our members represent management in employee relations, bargaining, and other activities involving public employee unions and associations. We also serve lawyers and private consultants exclusively serving management in all facets of employer-employee relations. CALPELRA trains the best and brightest of California's labor and employee relations professionals in its Labor Relations Academy, and CALPELRA's Labor Relations Academy Master (CLRM) certification has become a desired employment qualification in many California public agencies. Many of our members and others who attend CALPELRA's trainings and Annual Conferences are members of bargaining units in their public agencies.

Because our members come from a variety of different public agencies, they also have a broad array of perspectives. One of CALPELRA's primary concerns is ensuring that regulations are clear and unambiguous so that all involved in the process understand the applicable rules and procedures. The proposed regulations accomplish this, and CALPELRA is broadly supportive of the proposed revisions.

CALPELRA appreciates the efforts of the Board and staff to clarify the procedures through regulatory changes, and we thank you for the opportunity to provide input at this stage of the process.

Guert Sommer

cc: Ian Appleyard, CALPELRA Board President  
Jennifer Curtis, CALPELRA Board Vice President  
Thom Harpole, CALPELRA Board Secretary  
Debra Gill, CALPELRA Board Treasurer  
Debora Boutté, CALPELRA Immediate Past President  
Aram Chaparyan, CALPELRA Board Member  
Marguerite Malloy, CALPELRA Board Member  
Brad Rankin, CALPELRA Board Member  
Donna Vaillancourt, CALPELRA Board Member